

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 21-229 JRT/KMM

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)(1)

v.

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

JOHN SCOTT ENDERLEIN,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

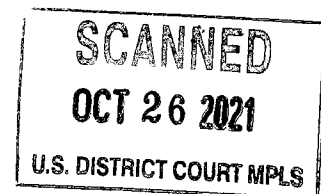
**COUNTS 1-5**

(Receipt of Child Pornography)

From on or about January 20, 2021 to January 30, 2021, in the State and District of  
Minnesota, the defendant,

**JOHN SCOTT ENDERLEIN,**

having been previously convicted under the law of the State of Minnesota relating to the aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, namely a conviction on or about December 11, 1995, in Hennepin County, Minnesota, for Criminal Sexual Conduct in the Second Degree, did knowingly receive visual depictions using a means and facility of interstate and foreign commerce that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means including by cellular telephone or computer device, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit:



COUNT	Date (on or about)	File Name	Description
1	January 20, 2021	9b7c1c78-4f5f-471d-af27-decff3335f21	A video file approximately 1 minute and 15 seconds long which depicts a minor female performing oral sex on a minor male approximately 12 to 16 years of age.
2	January 21, 2021	0530df4d-2d1d-4fb5-bddb-ff8d7a762e18	A video file approximately 18 seconds long which depicts a prepubescent girl, likely under the age of 6, performing oral sex on an adult male while he ejaculates into the child's mouth.
3	January 22, 2021	71b6ebf2-fee-47b0-ae3-a9b4accf07ba	A video file approximately 1 minute and 59 seconds long which depicts a prepubescent girl wearing stars and stripes thigh length socks being raped by an adult male.
4	January 24, 2021	bf3049ad-2442-4f98-a382-fa52f49785a7	A video file approximately 9 seconds long which depicts a minor girl performing oral sex on a minor boy while another minor boy simulates sexual intercourse with the minor girl from behind.
5	January 30, 2021	f03b4eb9-2fd3-45b9-b2b9-1bae4eb136d7	A video file approximately 1 minute and 5 seconds long which depicts two girls approximately 13 to 15 years of age undressing and inserting objects into their vaginas.

all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

### **COUNT 6**

(Distribution of Child Pornography)

On or about January 22, 2021, in the State and District of Minnesota, the defendant,

**JOHN SCOTT ENDERLEIN,**

having been previously convicted under the law of the State of Minnesota relating to the aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor,

namely a conviction on or about December 11, 1995, in Hennepin County, Minnesota, for Criminal Sexual Conduct in the Second Degree, did knowingly distribute visual depictions using a means and facility of interstate and foreign commerce that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means including by cellular telephone or computer device, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit:

Date (on or about)	File Name	Description
January 22, 2021	b99db647-ff28-4243-93fd-18244b73de54	A video file approximately 30 seconds long and depicts a minor girl removing her clothing, spreading her labia to display her vaginal opening, and touching a finger to her clitoris.
January 22, 2021	085fc487-9f72-4a55-a583-31d2c492c6d6	A video file approximately 1 minute 14 seconds long and depicts a minor girl posing nude, spreading her labia to display her vaginal opening, inserting a finger into her vagina, and displaying her anus to the camera.
January 22, 2021	c5c91c32-ce67-469f-8314-ce0aaac0alea	A video file approximately 2 minutes long and depicts a minor female naked from the waist down, spreading her legs open to display her vagina. The minor female then uses a stuffed toy animal to simulate a sex act.

all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

### **FORFEITURE ALLEGATIONS**

Counts 1 through 6 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

**JOHN SCOTT ENDERLEIN,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to a Apple iPhone 6 Plus, S/N FK2PN6CRG5QF.

If the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON